Rocky Flats
Environmental Technology Site

Revision 2

KAISER-HILL TEAM

QUALITY ASSURANCE
10 CFR 830.120
SITE IMPLEMENTATION PLAN

APPROVED BY _____ / R G Card 15/6/96
Acting President Kaiser-Hill Company, L L C — Date

Responsible Organization Environment, Safety & Health and Quality Effective Date 5-2-96

ORC review not required
Periodic review frequency 1 year from the effective date

Reviewed for Classification/UCNI
By _____
Date 5/6/96

The signatures on this page document that, for those areas under the representative's cognizance, the representative of each organization concurs that this write-up is accurate, factual, and reflects the current organization's position.

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LIST OF EFFECTIVE PAGES

Pages	Effective Date	Change Number
1-28	5-2-96	Rev 2

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1.0 Introduction

This document was developed by Kaiser-Hill Company, L L C (Kaiser-Hill) with input from the four Principal Subcontractors Kaiser-Hill and the four Principal Subcontractors conprise the Kaiser-Hill Team The four Principal Subcontractors are DynCorp of Colorado, Inc , (DCI), Rocky Mountain Remediation Services, L L C (RMRS), Safe Sites of Colorado (SSOC), and Wackenhut Services, L L C (WSLLC) This document is the Kaiser-Hill Team Implementation Plan for 10 CFR 830 120, Quality Assurance Requirements which is referred to as the Site Implementation Plan throughout this document This Revision 2 Site Implementation Plan is being submitted to the Department of Energy (DOE) as promised in the February 2, 1996 Site Implementation Plan, Rev 1, and in response to comments and guidance received from DOE This Site Implementation Plan has been prepared in accordance with 10 CFR 830 120 and the DOE Standard DOE-STD-1082-94, Preparation, Review and Approval of Implementation Plans for Nuclear Safety Requirements This Site Implementation Plan does not address DOE Order 5700 6C implementation

There are three significant differences between this Site Implementation Plan for 10 CFR 830 120 and the Revision 1 Implementation Plan submitted previously by Kaiser-Hill

- The previous Implementation Plan contained an appendix and an attachment that identified many weaknesses, deficiencies, and noncompliances with Price-Anderson Amendments Act (PAAA) requirements in the implementation of existing infrastructure programs and procedures Those items had an identified price tag of well over 400 million dollars to correct DOE provided comments and guidance that clarified DOE expectations Based on these comments and guidance, Kaiser-Hill and the Principal Subcontractors reviewed and evaluated the previously identified issues in accordance with the criteria contained in Appendix 1, Criteria for Including Issues in the Quality Assurance (QA) 10 CFR 830 120 Site Implementation Plan Items that did not meet the criteria contained in Appendix 1 have been deleted from this Site Implementation Plan but will be addressed under different DOE Orders and Rules and the corrective actions process and will be tracked The remaining implementation issues together with budget work package numbers, additional funding requirements, corrective action tasks, schedules, and significance levels, are identified in Attachment 1, Implementation Issue Matrix for Quality Assurance 10 CFR 830 120 Site Implementation Plan
- The previous Site Implementation Plan also included, as attachments, the Quality Assurance Program and Implementation Plan of each of the four Principal Subcontractors With this revision, the four Implementation Plans have been integrated into this one Site Implementation Plan
- The previous Site Implementation Plan stated that Kaiser-Hill intended to submit requests for exemptions from PAAA requirements Based on the evaluation of identified issues, no exemptions are being requested at this time

1.1 Background

On July 1, 1995, Kaiser-Hill became the Integrating Management Contractor (IMC) under a performance-based contract specified by the DOE In executing the IMC role, Kaiser-Hill has direct responsibility for scoping and assigning work, identifying standards for performance of work, integrating the work of the Principal Subcontractor companies, and providing performance oversight

The Site is an aging DOE facility in the post production, cleanup, and closure phase of its life cycle There is no intent to resume production operations The Kaiser-Hill Team has been tasked to stabilize and consolidate special nuclear material, process waste, perform decontamination and deactiviation, and environmental remediation activities

The Site has a wide range of hazards and safety uncertainties representing a substantial challenge for meeting PAAA requirements This includes the classical set of problems expected at an aging facility, such as facility authorization basis to meet the new Site mission, deteriorating facility and system material condition, past inadequate configuration control, proceduralization problems, etc In addition to these problems, operations were shut down in 1989 No special layup, deactivation, or storage precautions or actions were taken because it was believed that operations would resume in the near future This has created a unique set of problems

Since 1990, substantial effort was expended by the previous Management and Operating contractor and DOE, Rocky Flats Field Office (RFFO) to define and correct these problems Because of their complex nature and scope, combined with limited resources and changing mission objectives, most of the problems still exist under Kaiser-Hill Upon assuming responsibility for the Site on July 1, 1995, Kaiser-Hill inherited the existing implementing infrastructure programs and procedures that were developed over the previous five years The dilemma which faces the Site in a climate of declining funding is to ensure that the existing infrastructure programs and procedures are adequate to support accelerated, cost effective risk reduction, special nuclear material stabilization, and Site closure, while properly addressing PAAA requirements

1.2 Nuclear Safety Authorization Bases

The Site is currently performing work under an existing, DOE approved, authorization basis constituted by a number of programs, processes, controls, and technical basis documents and specifications These include traditional infrastructure programs such as conduct of operations radiological control program, criticality safety program and technical documents such as Safety Analysis Reports (SAR), Basis for Interim Operations (BIO) documents, Justification for Continued Operations (JCO), and Unreviewed Safety Question (USQ) Determinations

Kaiser-Hill believes that, collectively, these documents establish sufficient bases for safe execution of near term baseline and risk reduction activities In their current state of definition, however, these documents must be upgraded or

superseded to form authorization bases for the Site clean-up and decommissioning mission

Since assuming control of the Site, Kaiser-Hill has worked in concert with DOE, RFFO, the Defense Nuclear Facilities Safety Board, and other stake holders to institutionalize a more effective approach to development and implementation of a Site level authorization agreement and facility specific authorization bases to support execution of all nuclear related activities at the Site While progress has been made towards this end, Kaiser-Hill is still in the prototype phase and substantial work remains to complete the development effort and implement its results Kaiser-Hill has selected Building 771 as the authorization bases process and product prototype and work is in progress Upon completion of the Building 771 prototype, Kaiser-Hill will apply the experience and lessons learned to develop a schedule for the remaining facilities of interest and institutionalization of the authorization basis process

Until the prototype work is completed, the authorization basis process fully institutionalized, and the existing Site authorization bases upgraded or superseded, Kaiser-Hill will evaluate all planned work activities to ensure that sufficient safety basis exists to authorize the work activity for performance

2.0 Site Implementation Plan Summary

This 10 CFR 830 120 Site Implementation Plan provides information regarding implementation of the QA requirements and the Site Quality Assurance Program (QAP) for nuclear facilities and nuclear activities The Site QAP is contained in the Site Quality Assurance Manual The Site QAP describes the roles, responsibilities, and commitments for implementing the requirements of 10 CFR 830 120 for nuclear facilities and nuclear activities Lower-tier subcontractors to Kaiser-Hill, and the Principal Subcontractors are included and are accountable to Kaiser-Hill, or the Principal Subcontractor for whom they work, to implement the respective QA requirements Note War Reserve activities are excluded from applicability under 10 CFR 830 120

Baseline assessments have been conducted against existing Site infrastructure documents Many of these Site infrastructure documents reflect the previous contractor organization responsibilities and methods of doing business, and need to be revised Previously identified and reported weaknesses, deficiencies, and noncompliances (see Rev 1) have been reviewed and evaluated in accordance with the criteria contained in Appendix 1 Items that did not meet the criteria contained in Appendix 1 have been deleted from this Site Implementation Plan Budget work package numbers, additional funding requirements, corrective action tasks, schedules, and significance levels for items identified by the assessments are also provided in Attachment 1

No implementation issues were identified in the areas of criteria (1) Program and (7) Procurement

No exemption requests are being submitted at this time Funding for Fiscal Year (FY) 1996 is included in the budget work packages Additional funding

of $2,356,000 for FY 1997 and $1,758,000 for FY 1998 will be sought during the budget process
No significant new programs or activities needed to meet the QA Rule requirements have been identified No significant impacts to other programs or activities (not included in this Site Implementation Plan) have been identified
No special constraints to implementing this plan have been identified

3.0 General Information

This Site Implementation Plan for 10 CFR 830 120 includes input from the individual Principal Subcontractors and from the evaluation of previously reported weaknesses, deficiencies, and noncompliances

The DOE Standard DOE-STD-1082-94, Preparation, Review and Approval of Implementation Plans for Nuclear Safety Requirements, was used for the development of the format and content of this document

This Site Implementation Plan (Rev 2) is a revision to the Site Implementation Plan (Rev 1) submitted by Kaiser-Hill on February 2, 1996

This Site Implementation Plan applies to Site nuclear facilities and to nuclear activities performed by the Kaiser-Hill Team

This Site Implementation Plan is based on QA baseline assessments conducted by the Kaiser-Hill Team against existing Site infrastructure programs and procedures Valuable input was provided by Site workers This Site Implementation Plan identifies implementation issues that currently exist Attachment 1 lists the QA Criteria of 10 CFR 830 120, the infrastructure programs that support each criterion, the implementation issues, along with additional supporting information such as corrective action tasks, schedules, and funding Compensatory measures are recorded The Plant Action Tracking System numbers and significance levels are also included

The remainder of the Implementation Plan addresses each of the sections outlined in DOE-STD-1082-94

4.0 Applicability of Nuclear Safety Requirements

Title 10 CFR 830 120 applies to nuclear facilities and nuclear activities Designated nuclear facilities are identified in the Rocky Flats Site Safety Analysis Report, (SAR) Project Phase 1 Summary Report, Facilities Hazards Assessment and Classification, NSTR-016-94, Revision 2, September 29, 1995 The list of nuclear facilities is subject to change due to the movement of material between facilities as risk reduction activities are executed A list of current nuclear facilities is included in the Site QAP

On February 27, 1996, Kaiser-Hill and DOE, RFFO signed an Authorization Agreement (Agreement) to establish and maintain the Authorization Bases for activities at the Site as listed in the Master Activity List (MAL) The Agreement

will be, or is incorporated into the DOE contract with Kaiser-Hill for the operation of the Site

The MAL contains a list of currently identified work activities which are either (1) a baseline activity necessary for performance due to the presence of hazards, (2) a mission program activity authorized for performance, (3) a mission program activity authorized for planning only , or (4) a currently unauthorized mission program activity The MAL contains the currently approved nuclear activities, however, not every listed activity is a nuclear activity Efforts to define nuclear activities are on-going The MAL is a planning document and will be updated as needed The MAL is not the document that authorizes work

Site functions such as Human Resource Development, Financial Management, Benefits Administration, Food Service, Employee Assistance Program, and other functions required as a part of the conduct of business do not meet the definition of an activity Therefore, these functions are not included in the MAL

The requirements of 10 CFR 830 120 are applicable to the Site nuclear facilities and nuclear activities and are applied using a graded approach This Site Implementation Plan defines the corrective actions and schedules for meeting the QA Rule requirements

Standards that are required by law or contract are mandatory unless a temporary or permanent exemption from that requirement has been granted by one having proper regulatory authority The criteria for granting an exemption to a DOE nuclear safety requirement are specified in 10 CFR 830 62, Criteria

5.0 Safety and Implementation Guides and Technical Standards

Section J, Attachment F of the Kaiser-Hill contract with DOE contains the list of DOE Directives imposed on the Kaiser-Hill Team by DOE Kaiser-Hill intends to develop a smaller subset of requirements in the form of Standards/Requirements Identification Documents (S/RIDs) that contain a necessary and sufficient set of standards When the S/RIDs are approved by DOE in Authorization Agreements, they will replace the list of DOE Directives in Section J, Appendix F of the contract

It is recognized that the Site is in the decontamination, deactivation, decommissioning, and dismantling stage of its life cycle and that funding is limited As a result, the Site has adopted a minimum set of implementation guides and technical standards for QA In addition, QA requirements are being applied using a graded approach as described in Section 8 0

The Site Quality Assurance (QA) requirements are identified in the Quality Assurance Program Criteria document The Site Standards/Requirements Identification Document (S/RID), Section 2, Quality Assurance, which is under development, contains the same requirements When the S/RID is approved, it will replace the Site Quality Assurance Program Criteria document (Note If the approved S/RID results in the need to change the Site QAP, such changes

will be made) Both documents contain requirements from selected parts of the following technical standards

- ASME-NQA-1-1994, Quality Assurance Requirements for Nuclear Facility Applications, 1994
- ANSI/ASQC-E4-1994, Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs
- EPA-5360 1, Program and Policy Requirements to Implement the Mandatory Quality Assurance Program
- ASTM-C-1009-89, Standard Guide for Establishing a Quality Assurance Program for Analytical Chemistry Laboratories Within the Nuclear Industry
- DOE/AL-QC-1,1995, Quality Criteria
- DOE/AL Supplemental Directive AL 57XA, Standards and Calibration Program

Other safety and implementation guides and technical standards were considered in the development of the Site QA requirements and are listed in the Site Quality Assurance Program Criteria document

6.0 Baseline Assessments

The Kaiser-Hill Team has performed QA baseline assessments for their respective areas of responsibilities to determine whether the implementing infrastructure programs and procedures incorporate the QA requirements of 10 CFR 830 120, as applicable

6.1 Quality Assurance 10 CFR 830.120 Baseline Assessment

Quality Assurance 10 CFR 830 120 baseline assessments were performed from July 21, 1995, through January 30, 1996, by the Kaiser-Hill Team The IMC also provided oversight and technical assistance to the Principal Subcontractors The process was as follows

- Teams from the Kaiser-Hill Team identified specific nuclear activities and facilities that fell into each company's respective areas of responsibility
- The teams determined the programs and procedures used to control those activities
- With guidance from the team, responsible managers along with their technical personnel performed baseline assessments to determine whether the requirements of 10 CFR 830 120 were incorporated into the Site infrastructure programs and procedures Identified issues were documented on Compliance Summary Reports
- Representatives of organizations responsible for the Site infrastructure programs and procedures performed an additional baseline assessment The objective of the additional assessment was to determine implementation issues associated with the infrastructure programs and procedures such that Kaiser-Hill has confidence in the

functionality of the programs and procedures to support the Site mission
- The findings have been reviewed and evaluated in accordance with the criteria contained in Appendix 1 Items that did not meet the criteria have been deleted from this revision of the Site Implementation Plan
- Remaining open issues are included in Attachment 1 These items have been entered into and are being tracked through the Commitments Management and Corrective Actions Process

6.2 Verification of 10 CFR 830.120 Baseline Assessment

The IMC has conducted an assessment to verify that information gathered in the baseline assessment accurately reflects the status of the Site The verification included a sample of the implementation issues identified in the Compliance Summary Reports The verification found that the "shall" statements contained in 10 CFR 830 120 are reflected as requirements in the upper-tier governing Site documents and that those requirements flow down into the implementing procedures sampled in the verification

7.0 Additional Activities

The additional activities that are necessary to meet the requirements of 10 CFR 830 120 are described in Attachment 1

8.0 Graded Approach

Compliance with the identified applicable set of standards/requirements is mandatory The rigor and level by which they will be met will be based on the following graded approach criteria

- relative importance to safety, environment, safeguards and security,
- magnitude of any hazard involved,
- life cycle stage of a facility or activity,
- programmatic mission of a facility or activity,
- particular characteristics of a facility or activity, and
- other relevant factor(s) as deemed appropriate

The Kaiser-Hill Team applies graded approach in three ways

(1) Because of budget limitations and the life cycle stage of the facilities, graded approach is applied to the implementation of Site QA requirements For example Under Criterion 2, Training and Qualification, training of maintenance crafts will be focused on safety and other regulatory required training (e g Occupational Safety and Health Administration requirements) Other maintenance training and qualification will be limited to maintaining craft job proficiency at the journeyman level Under Criterion 3, Quality Improvement, trending of maintenance history data will be accomplished for specific buildings and equipment based upon a graded approach Maintenance

history data will not be maintained for all buildings or equipment Item characteristics, process implementation, and other quality-related information will be reviewed and the data analyzed to identify items, services, and processes needing improvement based upon a graded approach Under Criterion 5, Work Processes, corrective, preventive, and predictive maintenance will be accomplished for specific equipment based upon a graded approach Not all items will be maintained to prevent their damage or deterioration

(2) Graded approach is built into Site infrastructure programs and procedures including but not limited to, Policies and Procedures, Issues Management, Operational Readiness Reviews, Lessons Learned, Configuration Management, Training and Qualification, Emergency Management, Security and Safeguards, Engineering, Maintenance, Conduct of Operations, Radiation Protection, Occurrence Reporting, Procurement, Waste Management, and Nuclear Safety The Commitments Management and Corrective Actions Process provides a mechanism for prioritizing and evaluating unclassified deficiencies, concerns, and improvements It is the responsibility of the company-specific quality organization to ensure that QA requirements are applied in a manner commensurate with the type of work being accomplished Whenever a graded approach is applied in meeting a DOE nuclear safety requirement, the basis for selecting an action pursuant to the graded approach will be documented as required by 10 CFR 830 7, Graded Approach The requirement and instructions for documenting the basis for selecting an action pursuant to the graded approach are being added to the documents governing the Site procedures process

(3) Graded approach is also implemented by the Site process for Activity Based Management which includes Activity Based Planning (ABP) Activity Based Planning uses the DOE closure process for necessary and sufficient sets of standards

The central concept of ABP is the identification of a set of standards that is necessary and sufficient to control activities The process involves a deliberate focus on activities rather than on buildings or facilities and on standards that are necessary and sufficient rather than the universe of codes and standards The basic ABP product is a "control envelope" (an activity control envelope or a facility control envelope) that defines an activity or activities and identifies specifically applicable standards necessary for control of the specific activity The detailed focus on individual activities results in documented justification for the conduct of hazard and uncertainty reduction work without the necessity to restore the total facility to a fully operational status (resumption status) before the work can be performed

An Activity Control Envelope (ACE), developed with facility and Site knowledge as well as technical expertise, identifies the standards set to be used in the development of work control documents The ACE is developed by a carefully selected team with experience relevant to the activity to be performed The team uses an iterative process to define a finite scope of work with manageable uncertainty This iterative process includes specifying the tasks to be performed, identifying specific expectations or standards, defining surrounding conditions, and performing a hazard assessment for the subject

activity Expectations identified in the ACE are then correlated to mandatory and appropriate standards

The resulting ACE reflects those standards that, in the consensus of the development team, are necessary and sufficient for the safe accomplishment of the activity This method, for the team to reach a finding of adequacy on their product, is known as "expert closure "

The ACE process is expected to be initiated after general project specifications are defined, project goal activities are identified, and the technical processes that enable the goal activities are defined The completed ACE will assist in planning for final details in readiness preparation, but should not delay efforts to plan and commence general preparatory actions for readiness

9.0 Resource Assessment

Fiscal Year 1996 budget work package numbers, additional funding requirements, corrective action tasks, and schedules for items identified by the baseline assessments are provided in Attachment 1 Additional funding of $2,356,000 for FY 1997 and $1,758,000 for FY 1998 is identified in Attachment 1 Based on identified issues, current budget, and projected availability of funds, the existing work packages and identified additional funding should be sufficient to meet the requirements of 10 CFR 830 120 Quality Assurance Program implementation resources are assessed annually during the budget cycle

10.0 Prioritization

Implementation issues identified in the QA baseline assessment have been prioritized in accordance with the Site Commitments Management and Corrective Actions Process The level of importance to be placed on the correction of a deficiency or action request is evaluated for impact by considering the types of risks that may be encountered, consequences of these risks, and the frequency or probability of occurrence of like deficiencies or action requests. Significance levels are assigned based on the evaluation in relation to the impact on health, safety, the environment, regulatory compliance, safeguards and security, or the operation or mission at the Site Significance levels are classified as

- High - Significant Impact (Significance No of 7 to 11)
- Medium - Moderate Impact (Significance No of 4 to 6)
- Low - Minor Impact (Significance No of 0 to 3)

The significance levels for the implementation issues are included in Attachment 1

11.0 Milestones and Schedules

Milestones and schedules have been developed and will be tracked Scheduled completion dates for identified implementation issues are shown in Attachment 1 Intermediate tasks are entered into the Plant Action Tracking System and will be tracked through the Commitments Management and Corrective Actions Process Detailed corrective action plans are available through the Kaiser-Hill Commitments Management organization

12.0 Exemptions

No exemptions from the criteria of 10 CFR 830 120 are being requested

13.0 Compensatory Actions

Compensatory actions for identified implementation issues are documented in Attachment 1

14.0 Tracking

Implementation issues identified in Attachment 1 are being tracked by the Commitments Management and Corrective Actions Process

APPENDIX 1

Criteria for Including Issues in the Quality Assurance 10 CFR 830.120 Implementation Plan

The DOE expectation is that the Implementation Plan for 10 CFR 830 120 will identify the status of implementing the QA requirements down to the floor level

Revision 1 of the Site Implementation Plan, submitted to DOE on February 2, 1996, contained implementation and compliance issues that had a price tag of well of 400 million dollars to correct DOE provided comments and guidance both in meetings and in writing that clarified DOE expectations [1] Based on these comments and guidance, the Kaiser-Hill Team evaluated the previously reported issues using the following criteria

Site programs and functions such as fire protection, conduct of operations, maintenance, safeguards and security, and others are recognized to be enforceable under 10 CFR 830 120, however, detailed plans for these programs and functions will be addressed by other DOE Rules and DOE Orders The Kaiser-Hill Team is currently in the process of developing Standards/Requirements Identification Documents (S/RIDs) to identify the necessary and sufficient subset of requirements to support Site activities Certain deficiencies identified in Appendix 1 of Revision 1 for Site programs and functions may no longer be relevant under these new S/RIDs

The following Implementation Issues are included in the 10 CFR 830 120 Implementation Plan

1 QA issues that are not governed by another DOE Rule (e g 10 CFR 835) or DOE Directive

2 Programmatic QA issues not addressed by Implementation Plans or Requests for Approval as discussed above

3 Implementation deficiencies Implementation means that where a requirement applies, a process is established (i e formal training, assessments, and / or inspection / acceptance testing) or a tool is available for use (i e procedure, design specifications, and / or procurement records) which fulfills the intent of the requirement and allows work to be performed in a safe and effective manner Lack of such a process or tool is an implementation deficiency

Lack of budget / resource issues that remain following graded approach consideration, and that are of such extent so as to jeopardize development and/or implementation of the program / process, are considered to fall under the category of Implementation Issues

Compliance issues are not included in the Implementation Plan Compliance is the day-to-day utilization of these processes / tools and conformance to the intent during the actual performance of work It is understood that on any given day someone may not comply with a requirement, knowingly, or unknowingly, and that the actual noncompliance with a requirement may be an apparent violation and could also be deemed enforceable in accordance with 10 CFR 820

[1] Memorandum SIG NAM 07019 from David A Brockman to Tony R Buhl, Rocky Flats Field Office Expectations for Quality Assurance Plan and Implementation Plan, dated April 11, 1996

Attachment 1
Implementation Issue Matrix For
Quality Assurance 10 CFR 830.120 Site Implementation Plan

10 CFR 830 120 QA Criteria	Imp. Issues	Implementing Infrastructure Programs	Deficiency Implementation Activity (Responsible Organization) Compensatory Action	Scheduled Completion Funding Source PATS Number Significance Level
(c) Quality Assurance Criteria (1) Management (i) Program	No	Quality Assurance Program & Implementation Plan (QAP&IP) - Site Quality Assurance Manual		
(c) (1) Management (ii) Personnel Training and Qualification	Yes	Training	**Deficiency:** Qualification and Continuing Training program for Engineering personnel is not formalized **Implementation Activity:** Update the Engineering and Project Manual QA Plan to identify 1-S50-T&Q-QC-002 as the method for compliance to qualification requirements (KH-SETS) **Compensatory Action:** The methods used by SETS for complying with the qualification and continued training requirements are addressed in 1-S50-T&Q-QC-002 and the Site Training User's Manual	•9/30/96 •WP-82011 •96-000784 •6

Attachment 1
Implementation Issue Matrix For
Quality Assurance 10 CFR 830.120 Site Implementation Plan

10 CFR 830 120 QA Criteria	Imp Issues	Implementing Infrastructure Programs	Deficiency Implementation Activity (Responsible Organization) Compensatory Action	Scheduled Completion Funding Source PATS Number Significance Level
(c) (1) Management (11) Personnel Training and Qualification CONTINUED			**Deficiency** Qualification Standard Packages need development and/or revision **Implementation Activity:** Review and revise Qualification Standard Packages (RMRS) Develop SSOC Training Improvement Plan, and implement the necessary training per the Training Improvement Plan (SSOC) **Compensatory Action:** RMRS has conducted a company-wide assessment to determine the status of existing training and qualifications Certain QSPs have been prioritized for review and revision, if necessary For example, the QSP for Non-Destructive Assay Operations has been revised Other qualifications are being prioritized for revision (RMRS) Continue to provide training on an as-identified basis pending implementation of the SSOC Training Plan Additional management and supervisory attention has been provided, and increased management observation of work activities is being performed Specialized training has been developed to respond to identified needs and areas of weakness The general experience level and skill level of operators is adequate Less experienced operators are teamed with more experienced operators on the evolution to provide a breadth and depth of knowledge The scope of work which the less experienced operators are given is administratively controlled by their supervisors (SSOC)	•4/30/97 (RMRS) •$500,000 to be pursued in FY97 budget (RMRS) •96-000781 (RMRS) •10 (RMRS) •9/30/97 (SSOC) •WP-31111 (and various) (SSOC) •96-000789 (SSOC) •3 (SSOC)

Attachment 1
Implementation Issue Matrix For
Quality Assurance 10 CFR 830.120 Site Implementation Plan

10 CFR 830 120 QA Criteria	Imp. Issues	Implementing Infrastructure Programs	Deficiency / Implementation Activity / Compensatory Action	Scheduled Completion / Funding Source / PATS Number / Significance Level
(c) (1) Management (11) Personnel Training and Qualification CONTINUED			**Deficiency** Job performance of inspection and test personnel is not periodically reevaluated as required by NQA-1 when inspection or test activities in the qualified area have not been performed for a year Removal from the job when not qualified is not covered Certificate of Qualification does not contain all required information **Implementation Activity** Will add requirements to procedure FI-8006 through the Document Modification Request process This action is subject to revision and direction by the Training User's Manual (DCI) **Compensatory Action** Program owner is aware of the "missing" procedure information but has been and is continuing to meet the intent of the requirement through verbal and written instructions	•6/15/96 •WP-81601 •95-004430 95-004429 •Low Low
			Deficiency: Applicable Quality Assurance Program requirements are not covered in current training documentation (NQA-1, 1994, Part 1, Supplement 2S-4, Sections 2 and 3) **Implementation Activity:** Incorporate requirement into rewrite of Level 1 document, and develop Document Modification Request for requirements documents, as appropriate (KH-T&Q, ESH&Q) **Compensatory Action:** First line supervision and managers are already responsible for job specific indoctrination into the principles and application of Quality Assurance by workers under their direction	•10/31/96 •WP-81101 •95-004438 •Low
			Deficiency: 1-S50-T&Q-QC-002, Section 4 1 refers to Training Implementation Matrix (TIM) as required by 5480 20A TIM (Rev 2, 3, and 4) refers only to 14-nuclear facilities, rather than the larger number identified in the Site SAR Project Phase I Summary Report No NSTR-016-94, Rev 2 **Implementation Activity:** Training and Qualification Council to develop strategy and revise documentation using a graded approach (KH-T&Q) **Compensatory Action:** Managers will ensure that employees of their company have adequate training to ensure work can be done safely and in accordance with requirements	•10/31/96 •WP-81101 •95-004418 •Low

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10 CFR 830 120 QA Criteria	Imp. Issues	Implementing Infrastructure Programs	Deficiency Implementation Activity (Responsible Organization) Compensatory Action	Scheduled Completion Funding Source PATS Number Significance Level
(c) (1) Management (iii) Quality Improvement	Yes	Sitewide Commitments Management and Corrective Actions Process (CM&CAP) - Management Assessment Process [See QA Criteria (3) Assessment (i) Management Assessment] - Cause Analysis Process - Lessons Learned Process	**Deficiency:** Procedure for Trend Analysis does not reflect current requirements and roles, responsibilities, and interfaces for IMC and subcontractors **Implementation Activity:** Revise the Trend Analysis procedure to reflect current requirements, organization structure, and interfaces (KH-ESH&Q) **Compensatory Action:** K D Stovall letter (Memo Number, KDS-049-96) to appropriate personnel requiring that existing procedures be used until properly revised or canceled	•9/30/96 •WP-83311 •96-000783 •5
(c) (1) Management (iv) Documents and Records	Yes	Site Procedures Process - Integrated Work Control Program (IWCP) - Document Control - Records Management - Configuration Change Control Program (CCCP)/ Conduct of Engineering Manual (COEM)	**Deficiency:** The Site records management system does not provide appropriate storage of RMRS Quality Assurance Records until those records have been determined by RMRS to be inactive (i e , no longer needed to conduct business) **Implementation Activity:** Complete implementation of the MARS imaging system Once processed, hardcopy RMRS records will be forwarded to Site records management for permanent storage (RMRS) **Compensatory Action:** Since active Quality Assurance Records may remain in RMRS' possession for years, adequate controls and procedures are being developed and endorsed by Site records management An organization and central repository has been assigned to administer the records management program A team has been established to identify existing RMRS quality records Records Management is briefing other RMRS personnel on how to identify QA records and implement interim control measures During the implementation of the MARS imaging system and associated procedures and documentation RMRS records are being transmitted to the RMRS Records Center for temporary storage until processing can occur	•9/30/96 •$652,000 being reallocated from existing WPs •96-000778 •10

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(c) (1) Management (iv) Documents and Records CONTINUED	Yes	Site Procedures Process - Integrated Work Control Program (IWCP) - Document Control - Records Management - Configuration Change Control Program (CCCP)/ Conduct of Engineering Manual (COEM)	**Deficiency:** The Document Control Program is not adhered to by the following organizations Engineering, Analytical Labs, Metrology, Radiological Engineering, Industrial Hygiene, Environmental Restoration Management, WSI In addition, an unknown number of Site companies have instituted their own document control systems in a variety of other areas **Implementation Activity:** Incorporate non-centralized document control systems into the Site Document Control infrastructure (KH-F&A) **Compensatory Action:** The Kaiser-Hill Vice President for Finance and Administration has issued a notification (Memo Number LAM-212-96) to the Senior Managers of all Site Contractors specifying the requirement to adhere to the Site Document Control procedures	•10/01/96 •WP-82501 •96-000385 •10
(c) (2) Performance (i) Work Processes	Yes	Price-Anderson Process - IWCP - Radiological Control Program - Nuclear Material Control & Accountability (NMC&A) - COOP - Site Procedures Process - Procurement Process - Nuclear Safety - CCCP/COEM - Emergency Preparedness - Waste Management	**Deficiency:** Lack of acceptance criteria and process controls for RMRS receipt of products and services from other contractors **Implementation Activity:** Develop criteria for the acceptance of products and services (RMRS) **Compensatory Action:** RMRS has trained its Quality Engineers (QEs) on the requirements of existing procurement systems QEs are required to review all purchase requisitions for proper quality controls and adherence to existing procurement requirements RMRS will continue to use existing procedures and documentation for acceptance of products from outside sources until specific acceptance criteria can be developed RMRS will develop case-specific letters of agreement with other principal subcontractors for acceptance of products and services until specific acceptance criteria can be developed	•4/30/97 •$60 000 to be pursued in FY97 budget •96-000782 •10

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(c) (2) Performance (1) Work Processes CONTINUED			**Deficiency:** Lack of definition of responsibilities for execution and oversight of welding program **Implementation Activity:** Revise 1-8300-WELD-001, Welding Program Plan, and 1-E27-WELD-001, Welding Operations These will be combined into a single document that will provide the minimum elements and requirements for all subcontractor welding programs (KH-SETS) **Compensatory Action:** Provide engineering oversight of subcontractor welding program RMRS Welding Program reviewed in April, 1996	•9/30/96 •WP-82009 •96-000786 •5
			Deficiency: Waste Management procedures need revision **Implementation Activity:** Determine procedures that require revision Write or revise procedures for Waste Management and Environmental Restoration using the Site procedure writing methodology or the approved RMRS work instruction method (RMRS) **Compensatory Action.** RMRS organizations including the Quality group are conducting reviews of existing procedures to determine their applicability and adequacy to operations under the RMRS contract Procedures are being prioritized for revision RMRS has developed and is piloting a work instruction program to address processes not covered by existing procedures	•3/31/98 •$1,758,000 to be pursued in each FY97 & 98 budgets •96-000779 •10
			Deficiency: Price-Anderson Implementation Process and Reporting are not adequately covered in existing procedures **Implementation Activity:** Revise procedures to include the entire Price-Anderson process, including a reporting procedure to be developed (KH-ESH&Q) **Compensatory Action:** Utilize DOE Handbook #DOE-HDBK-1089-95 (Rev 1) (Guidance for Identifying, Reporting and Tracking Nuclear Safety Noncompliance's) as well as a draft internal procedure and flowchart for this process	6/30/96 •WP-83311 •95-004412 95-004413 •High High

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(c) (2) Performance (1) Work Processes CONTINUED			**Deficiency:** Guidance needs to be provided on how to build graded approach into Site infrastructure programs and procedures Instructions need to be provided for documenting the bases for selection using graded approach **Implementation Activity:** Graded Approach will be addressed as a requirement in the Site Documentation Requirements Manual which is being developed by the Site Streamlining Initiative Team (KH-ESH&Q) **Compensatory Action:** None Required	•9/30/96 •WP-83408 •95-004370 •Medium
			Deficiency: Site procedures and other work control documents (excluding IWCP work packages) need to be reviewed and updated, revised, rewritten as a job instruction, deleted or developed, as appropriate to reflect the IMC concept, organization, and desired method of doing work **Implementation Activity:** Define the requirements for the documentation life cycle Review and revise the Site document hierarchy, as appropriate Develop the criteria for elimination of unnecessary or obsolete documentation Develop a Site Documentation Requirements Manual Develop an implementation plan for revising procedures and work control documents (KH-ESH&Q) **Compensatory Action:** George O'Brien letter to "All Site Personnel," dated 6/29/95, instructed the Site to use the existing procedures until properly revised or canceled	•3/30/98 •various •95-004416 •Medium

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(c) (2) Performance (i) Work Processes CONTINUED			**Deficiency:** Work instructions for facility operation support functions and routine facility activities in B771 not involving fissile material movement and processing of fissile material are not developed or implemented **Implementation Activity:** Streamline the procedure process and the procedure review process Issue the necessary work instructions for facility operation support functions and routine facility activities in B771 (SSOC) **Compensatory Action:** Fissile material movement and fissile material processing are controlled using formal procedures Other support functions are controlled by teaming experienced workers with other workers, frequent work reviews by supervision, and close supervisory support	•3/31/98 •WP-32104 •95-004446 •4
			Deficiency: Building 991 procedures have not been developed and approved for operation of certain vital safety systems, process operations and administrative programs Organizations in B991 do not use approved instructions and procedures to direct the performance of some tasks Approximately 50 more procedures are needed for Site procedure requirement compliance **Implementation Activity:** Material movements to/from B991 and B886 will be performed using currently approved procedures Using a graded approach, further development of procedures is not cost effective (SSOC) **Compensatory Action:** Remove the remaining fissionable material contained in sealed Department Of Transportation shipping containers using existing procedures and system walkdowns for operators	•3/31/97 •WP-21110 WP-33201 •95-004414 •Low

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(c) (2) Performance (i) Work Processes CONTINUED			**Deficiency:** Procedures used to support operation and testing for some safety systems in Building 371/374 have not yet been developed to the approved Site procedure process The calibration system is immature, in that gages needed to support safety systems are not all identified or calibrated **Implementation Activity:** Identify and develop procedures for operation and testing of the safety systems needed for supporting completion of the Caustic Waste Treatment System and tank draining activities Identify and calibrate gages needed for safety systems in B371 in support of the authorization basis Identify and develop procedures for operation and testing of the remainder of the utility systems in B371 (SSOC) **Compensatory Action:** Existing systems are operated by experienced operators Work scope is administratively controlled by supervision Frequent supervisory oversight is provided to observe the operations Calibration is provided as the system needs are identified	•6/30/97 •WP-34104 •95-004427 95-004439 95-004440 •7 4 2

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(c) (2) Performance (i) Work Processes CONTINUED			**Deficiency.** The new Site Authorization Basis Process currently being developed and demonstrated has not been completely institutionalized in procedures The current authorization basis documents need to be revised to reflect the Site closure mission SSOC cannot at present make a definitive determination as to the specific system, items and programs to which the requirements of the QA Rule will apply, for Personnel Training and Qualification, Quality Improvement, Documents and Records, Work Processes, Design, Inspection and Acceptance Training, Management Assessment, and Independent Assessment New safety-basis authorization documents are needed to determine the activities to which the requirements of the QA Rule apply **Implementation Activity:** 1) The process for developing new safety-basis authorization documents will be piloted at Building 771 2) The experience gained during development of the new safety-basis authorization document at Building 771 will be used to issue a schedule for developing the balance of the authorization-basis procedures/documents 3) Issue a schedule for developing similar authorization basis documents for the remaining nuclear facilities (KH-SETS) **Compensatory Action:** The Site will continue to apply the existing authorization bases infrastructure programs such as conduct of operations, radiological control program, criticality safety program, and technical documents such as Safety Analysis Reports (SAR), Basis for Interim Operations (BIO), Justification for Continued Operations, (JCO) and Unreviewed Safety Questions (USQ) Kaiser-Hill will evaluate all planned work activities to ensure that sufficient safety basis exists to authorize the work activity for performance	•1/1/97 •WP-44302 •WP-84310 •96-000788 •10

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(c) (2) Performance (ii) Design	Yes	CCCP/ COEM - Software Management Program	**Deficiency:** Failures of various organizations to comply with the Site Software Management Program constitutes programmatic breakdown Quality assurance controls for developing, obtaining, deploying, or using software contained in 1-45000-CSM-001 are not being followed, the procedure is outdated since the cancellation of DOE 1330 1C **Implementation Activity:** Issue will be addressed by revision of 1-45000-CSM-001 to incorporate 10 CFR 830 120 requirements using a graded approach (KH-F&A) **Compensatory Action:** Use existing procedure until revised	•7/30/96 •WP-83605 •96-000787 •6
			Deficiency. Design related criteria for activities used by Criticality Safety in support of nuclear activities are not clearly and consistently defined **Implementation Activity:** Develop/improve validation and verification program Develop/improve Criticality Safety engineering tools and resources (SSOC) **Compensatory Action.** Utilize current design requirements and existing engineering tools and resources	•12/31/96 •WP-31111 •96-000791 •3
			Deficiency. Validate design controls for nuclear-related environmental software [Waste and Environmental Management System (WEMS), Rocky Flats Environmental Data System (RFEDS)] **Implementation Activity.** Revise 1-V51-COEM-DES-210, Design Process Requirements to establish verification and validation for software (KH-SETS) **Compensatory Action:** A revision to 1-V51-COEM-DES-210 is in process to incorporate the requirements for necessary design controls to System Category 1&2 software A memo from L R Bailey, 4/16/96, to Site Engineering Managers requests that changes to Category 1&2 software be as design changes until the procedure is revised	•7/1/96 •WP-82011 •96-000785 •6
(c) (2) Performance (iii) Procurement	No	Procurement - IWCP - CCCP/ COEM		

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(c) (2) Performance (iv) Inspection and Acceptance Testing	Yes	Control of M&TE - IWCP - CCCP / COEM - Procurement	**Deficiency:** Reverse traceability of out of calibration M&TE inadvertently used for acceptance testing is not addressed by program procedures as required by NQA-1, Section 3 2 **Implementation Activity:** Revision to 1-I97-ADM-12 01, Control of Measuring and Test Equipment will address this issue (DCI) Identify and calibrate gauges needed for safety systems in support of the new authorization basis (SSOC) **Compensatory Action:** For M&TE found out of calibration, Metrology has been and is continuing to notify the M&TE users of the condition through instructions and the issuance of a Metrology Variance Report per MLA-00008, Metrology Labs Administrative Procedure (DCI) Continue to provide calibration as system needs are identified (SSOC)	•9/30/96 (DCI) •WP-81404 (DCI) •95-004355 (DCI) •4 (DCI) •6/30/97 (SSOC) •WP-34104 (and various) (SSOC) •96-000792 (SSOC) •5 (SSOC)
			Deficiency. Nuclear facilities have not fully implemented the Inspection & Acceptance Testing requirements of procedure 1-62300-HSP-11 03, Pressure Vessels, Systems, and Relief Valves **Implementation Activity** Identify and develop actions satisfying 1-62300-HSP-11 03 NOTE A task team of SSOC, DynCorp and IMC personnel has been formed to assess the adequacy of previously proposed actions Kaiser-Hill Independent Assessment has identified this noncompliance as a Sitewide mission-critical issue A cost and schedule for programmatic activities and implementation is to be updated (SSOC) **Compensatory Action:** The number of pressure vessels in service has been reduced by Lockout/Tagout, and several important systems have been walked down to identify key valves for priority replacement as funding becomes available	•6/30/96 •WP-95801 •92-004486 93-005345 •High High

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(c) (3) Assessment (i) Management Assessment	Yes	Commitments Management and Corrective Action Process - Management Assessment - Compliance Management	**Deficiency:** Self-evaluations and Management Assessments are not being performed consistently across the Site due to procedural inadequacy **Implementation Activity.** Develop company-specific Management Assessment procedures to implement the Site Level Management Assessment Program [(KH-DCI-SSOC)-9/31/96, (RMRS)-9/30/97] **Compensatory Action:** Site managers will continue to apply informal management assessment approaches until the company-specific management assessment procedures are developed	•9/30/97 •WP-83402 WP-82304 WP-31111 RMRS to pursue $38,000 in FY97 budget •93-003824 96-000780 •Medium 10
(c) (3) Assessment (ii) Independent Assessment	Yes	Independent Assessment	**Deficiency**· Sitewide programmatic compliance and audit planning methodology has not been defined or applied to ensure overall Quality Program coverage **Implementation Activity** Revise the assessments procedure to include a Sitewide programmatic audit planning methodology to address overall quality program coverage (KH-ESH&Q) **Compensatory Action**· Utilize the existing independent assessment procedure until revised and apply appropriate programmatic audit planning pending procedure revision	•9/30/96 •WP-83402 •94-007511 •High